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July 11, 2025

BY ECF

Honorable Nicholas G. Garaufis
United States District Court Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: *Eric Adams 2025, et al. v. New York City Campaign Finance Board*, No. 25-cv-3380 (NGG)

Dear Judge Garaufis:

We represent Respondent-Defendant, New York City Campaign Finance Board (“the Board”), in the above-captioned case. We write in response to the Court’s July 10, 2025 Order.

The vote referenced in paragraph 29 of the Second Declaration of Paul S. Ryan took place on June 20, 2025 in response to the Cuomo Campaign’s Rule 7-09 Petition for reconsideration of the Board’s May 30, 2025 payment determination.¹ The June 20 vote reduced the amount of funds that were withheld based on an amendment to erroneous disclosures from an independent spending committee, Fix the City. The Cuomo Campaign filed its Rule 7-09 Petition for reconsideration on June 3, 2025, notifying the Board that Fix the City had amended its disclosures. The Board did not allow the Cuomo Campaign to correct a mistake the Cuomo Campaign made; rather, the Board corrected its own determination that had been based on incorrect information from a third party. Consistent with Rule 7-09(b), the Cuomo Campaign demonstrated good cause for the previous failure to submit such information because that information was controlled by a third party and therefore could not have been submitted by the Cuomo Campaign prior to the May 30 determination.

Respectfully submitted,

/s/ Douglass B. Maynard
Douglass B. Maynard

¹ May 30, 2025 was a payment date for candidates in the Democratic primary. *See* Press Release, NYC Campaign Finance Board, NYC Campaign Finance Board Approves Pre-Primary Matching Funds Payments to 2025 Candidates (May 30, 2025), <https://www.nyccfb.info/media/press-releases/nyc-campaign-finance-board-approves-pre-primary-matching-funds-payments-to-2025-candidates-05-30>. Because Mayor Adams is running as an independent, he was not eligible for a matching funds payment on May 30, 2025.